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Hon. LaShann DeArcy Hall
United States District Court
Eastern District of New York
225 Cadman Plaza East, 4H North
Brooklyn, New York 11201

Dated: February 21st, 2023

Re: Yerkin v. Klebanov et. al., Docket #: 23-Civ-02399(LDH)(CLP)

Dear Judge DeArcy Hall,

The undersigned represents Plaintiff, Yerkin Amirkhanov. We respectfully submit this letter pursuant to Part I-E of the Court's Individual Practices to request that the deadline for Plaintiff's Reply be extended two weeks from Friday February 23rd, 2024 to Friday March 8th, 2024.

We previously requested a modification of the briefing schedule on 12/01/2023, which was kindly amended on 12/28/23. Pursuant to the briefing schedule, Plaintiff timely served the Motion on January 12th, 2024, and the Defendants' Opposition was served on February 9th, 2024. The Reply is due on February 23rd, 2024. Plaintiff respectfully requests an extension of time until March 8th, 2024 to file the Reply. This extension is necessary to ensure a thorough and comprehensive response to the extensive oppositions filed by both the NSC and the individual defendants. Moreover, the complexity of the Defendants' response necessitates two Replies to each of the Defendants.

This is our first request for an extension of time to file the Reply; and it will not impact any other scheduled court dates. The undersigned sought opposing counsel's consent by email on the morning of February 20th, 2023, however no response was provided.

We thank the Court for consideration of this request.

Respectfully Submitted.,

/s/ Irina Shpigel
Irina Shpigel

Cc: All counsel of record via ECF